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15 Attorneys for Plaintiffs

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

20 CALIFORNIA COALITION FOR WOMEN  
PRISONERS et al.,

21 Plaintiffs,

22 v.

23 UNITED STATES OF AMERICA FEDERAL  
24 BUREAU OF PRISONS et al.,

25 Defendants.

Case No. 4:23-cv-04155-YGR

**DECLARATION OF KARA J.  
JANSSEN IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE MATERIALS  
UNDER SEAL**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: June 23, 2025

1 I, Kara J. Janssen, hereby declare as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am Senior  
3 Counsel in the law firm of Rosen Bien Galvan & Grunfeld LLP, and counsel of record for  
4 the Plaintiffs and Proposed Class. I have personal knowledge of the facts set forth herein,  
5 and if called as a witness I could competently so testify. I make this declaration in support  
6 of Plaintiffs' Administrative Motion to File Materials Under Seal.

7 2. Per the Court's Order, plaintiffs are filing its' Memorandum of In-Person  
8 Legal Visits to FCI Waseca under seal, attached as Exhibit A. This document contains  
9 class members' personal identifiable information including personal health information.

10 3. I met and conferred with Counsel for Federal Defendants by phone on  
11 October 28, 2024 and counsel stated that Federal Defendants take no position on this  
12 request.

13 I declare under penalty of perjury under the laws of the State of California that the  
14 foregoing is true and correct, and that this declaration is executed at San Francisco, CA  
15 this 28<sup>th</sup> day of October, 2024.

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17 By: /s/ Kara J. Janssen  
18 Kara J. Janssen  
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